

**EXHIBIT "C"**

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*Attorney for Plaintiff*

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

Salley C. Purser, )

Plaintiff, )

v. )

Josef F. Boehm, Allen K. Bolling,  
and Bambi Tyree, )

Defendants, )

Case No: A05-0085 (JKS)

**PLAINTIFF'S RESPONSES TO DEFENDANT BOEHM'S SECOND SET OF  
DISCOVERY REQUESTS**

INTERROGATORY NO. 1: Question compounding in nature and this information has already been supplied to the Defendant on more than one occasion. Defendant has, in his own possession, the information requested with regard to the Federal Criminal charges he pled guilty to. The Plaintiff knows of the witnesses but does not personally know the witnesses, except for "F.A.". Kimberly Swentek, Bambi Tyree, Leslie Williams, Allen Bolling, Josef Boehm, Paxton Purser and Gerald Barnes. Some of these individuals the Plaintiff met while at Defendant Boehm's home during the period of 2001-2003.

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The other witnesses in this action are doctors and counselors, care providers and Dr. Rose and Francis Gallella which are two experts hired by the Plaintiff. Their vitae's, name, addresses and phone numbers have been supplied to Defendant Boehm twice.

INTERROGATORY NO. 2: At the time the Plaintiff met Defendant Boehm she did not attend school. The Plaintiff completed 9<sup>th</sup> grade and received her GED from "9 Star" in March 2005. Plaintiff also attended the Adult Learning Center in Anchorage, Alaska to complete her GED. This institution no longer exists. The Plaintiff was suspended in the 10<sup>th</sup> grade for suspected drug use. These were allegations but no proof of actual drug use. The Plaintiff decided on her own not to return to school after suspension.

INTERROGATORY NO. 3: The Plaintiff was arrested in May 2004 for misdemeanor possession of crack cocaine and is on Federal Probation until August 2009.

INTERROGATORY NO. 4: The Plaintiff has previously supplied this information twice to the Defendant, once in Preliminary Disclosures and by supplement months later.

INTERROGATORY NO. 5: The Plaintiff objects to this Interrogatory as it is overbroad, it shows no relevance and has a blanket time frame with no dates established.

INTERROGATORY NO. 6: Answered.

REQUEST FOR ADMISSION NO. 1: Admit.

REQUEST FOR ADMISSION NO. 2: Denied.

REQUEST FOR ADMISSION NO. 3: Admit. One time only.

REQUEST FOR ADMISSION NO. 4: Denied.

REQUEST FOR ADMISSION NO. 5: Admit.

REQUEST FOR ADMISSION NO. 6: Admit.

REQUEST FOR ADMISSION NO. 7: Admit. Twice only.

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REQUEST FOR ADMISSION NO. 8: Admit.

REQUEST FOR ADMISSION NO. 9: Admit.

REQUEST FOR ADMISSION NO. 10: Denied.

REQUEST FOR ADMISSION NO. 11: Admit.

REQUEST FOR ADMISSION NO. 12: Admit.

REQUEST FOR ADMISSION NO. 13: Denied.

REQUEST FOR ADMISSION NO. 14: No Admission No. 14. Defendant did not properly number his admissions.

REQUEST FOR ADMISSION NO. 15: Asked and Answered.

REQUEST FOR ADMISSION NO. 16: Denied.

REQUEST FOR ADMISSION NO. 17: Admit.

REQUEST FOR ADMISSION NO. 18: Denied.

REQUEST FOR ADMISSION NO. 19: Denied.

REQUEST FOR ADMISSION NO. 20: Admit.

REQUEST FOR ADMISSION NO. 21: Denied.

REQUEST FOR ADMISSION NO. 22: Plaintiff has no recollection and therefore Denied.

REQUEST FOR ADMISSION NO. 23: Denied.

REQUEST FOR ADMISSION NO. 24: Plaintiff objects to the verbage "traded sexual favors" and admits to having sex with other individuals.

REQUEST FOR ADMISSION NO. 25: Plaintiff once again objects to the verbage "traded sexual favors". Mr. Bucher was Plaintiff's boyfriend at one time.

REQUEST FOR ADMISSION NO. 26: Plaintiff has no knowledge and therefore Denied.

REQUEST FOR ADMISSION NO. 27: Denied.

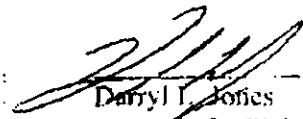
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REQUEST FOR ADMISSION NO. 28: Denied. Defendant Boehm was the primary cause of my drug dependency.

REQUEST FOR ADMISSION NO. 29: Denied. Plaintiff was never a prostitute.

REQUEST FOR ADMISSION NO. 30: Denied.

DATED this 6<sup>th</sup> day of December 2006 at Anchorage, Alaska.



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THE STATE OF ALASKA

NOTARY PUBLIC

NOTARY PUBLIC

I, the undersigned, being first duly sworn, upon oath, declare and

certify that the above-entitled action, that I have read and understand, and the propagator has delivered to me as true and correct, to my knowledge and belief.

*Sally Proctor*  
Sally Proctor

WITNESSED my hand and the seal of my office this 11th day of December,

State of Alaska  
NOTARY PUBLIC  
Deborah L. Fenton-Bushue  
Commission No: 101289

*Deborah L. Fenton-Bushue*  
NOTARY PUBLIC  
2/19/2009

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CERTIFICATE OF SERVICE

This is to certify that on the 8<sup>th</sup> day of December, 2006, a true and correct copy of the foregoing document was caused to be mailed to the following parties of record via United States Certified Mail:

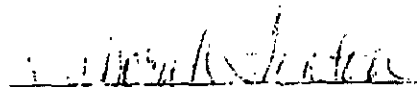
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Allen K. Bolling  
Inmate No: 14911-006  
USP Terre Haute  
U.S. Penitentiary  
P.O. Box 12015  
Terre Haute, IN 47801  
CM No.: 7006 0810 0000 2976 8006

Bambi Tyree  
c/o Mary Pate  
425 G Street, Suite 930  
Anchorage, Alaska 99501  
CM No: 7006 0810 0000 2976 7993

Josef Boehm  
c/o David Kenner  
Kenner Law Firm  
16000 Ventura Blvd., Ste. 1208  
Encino, CA 91436  
CM No: 7006 0810 0000 2976 7986

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Deborah Fenton  
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